

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

DARYUSH VALIZADEH, an individual,

Plaintiff,

v.

JANE DOE, a/k/a "Susan"; and
JOHN AND JANE DOES 2-10, all
whose true names are unknown,

Defendants.

CIV. 16-5020

**DECLARATION OF
DARYUSH VALIZADEH**

I, Daryush Valizadeh, declare as follows:

1. My name is Daryush Valizadeh; I am over the age of 18 years and am fully competent to make this Declaration. The facts set forth in this Declaration are within my personal knowledge and are true and correct.
2. My permanent residence is in Box Elder, South Dakota.
3. On February 9, 2016, blogger S. Jane Gari posted an article on her website entitled "Roosh Valizadeh Accused of Rape." A copy of that article is attached hereto as **Exhibit A**.
4. Ms. Gari's blog entry alleged that, in November 2015, a woman named "Susan" contacted Ms. Gari and stated that I had raped her.
5. The story published on S. Jane Gari's blog is false. Not one element of it is true. I am certain that I have never even met the person interviewed in Ms. Gari's article.

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Pursuant to the laws of the United States, I declare under penalty of perjury the foregoing is true and correct.

Dated 3/29/2016.

DocuSigned by:
Daryush Valizadeh
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Daryush Valizadeh